

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

ERIC L. JEFFRIES, :
Plaintiff, : Case No. C-1-02-351
vs. : (Judge Beckwith)
CENTRE LIFE INSURANCE COMPANY, : (Magistrate Judge Hogan)
et al., :
Defendants. :

STATE OF OHIO)
) ss.;
COUNTY OF HAMILTON)

I, Christine L. Zerges, being first duly cautioned and sworn, state as follows:

1. I am over 18 years of age and make this statement based on personal knowledge.
2. I am a legal assistant employed by the law firm of Wood & Lamping.
3. I work with William R. Ellis and have responsibilities with regard to the case of

Eric L. Jeffries v. Centre Life Insurance Company, et al.

4. On October 6, 2003, I prepared a Notice of Deposition for the deposition of Dr. Fritz which was scheduled to take place on October 17, 2003 at 8:30 a.m. I sent a copy of this Notice to counsel for Mr. Jeffries, Mike Roberts.

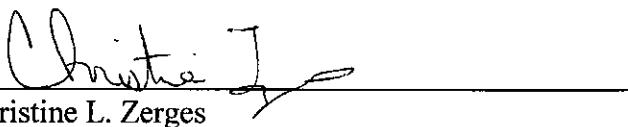
5. I sent notice of Dr. Fritz's deposition to Mr. Roberts by both facsimile and ordinary mail.

6. I received confirmation that the fax had been received by the law firm of Graydon, Head & Ritchey.



7. Mr. Roberts never responded regarding the deposition of Dr. Fritz.
8. I was present during a phone conference in which Mr. Roberts advised Mr. Ellis that he was not available for depositions the afternoon of October 17, 2003 because of his brother's wedding. The deposition of Dr. Fritz was scheduled to be completed well in advance of the afternoon.

Further affiant sayeth naught.

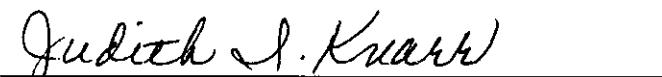


Christine L. Zerges

Sworn to and subscribed in my presence this 31 day of October 2003.



JUDITH I. KNARR
Notary Public, State of Ohio
My Commission Expires
August 2, 2004



Judith I. Knarr

Notary Public